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Fellows

600 New Jersey Avenue, NW, Suite 312  
Washington, DC 20001-2075  
Telephone: 202-662-9535  
TDD: 202-662-9538  
Fax: 202-662-9634

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JUN 17 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 17, 2002

VIA HAND DELIVERY

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte Presentation*  
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200,  
95-116, 98-170 and NSD File No. L-00-72

Dear Ms. Dortch:

On June 17, 2002, the undersigned met with Paul Garnett of the Commission's Wireline Competition Bureau to deliver the attached materials, which are being submitted in connection with the Commission's June 21, 2002, meeting regarding possible changes to the universal service contribution methodologies.

Pursuant to the Commission's *ex parte* rules, an original and 13 copies of this letter and attachment are being filed. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

Christopher R. Day

Attachment

cc: Matthew Brill, Office of Commissioner Abernathy  
Paul Garnett, WCB

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**THE CASE AGAINST CONNECTION-BASED  
USF ASSESSMENT**

Consumers Union  
Texas Office of Public Utility Counsel  
Consumer Federation of America  
Appalachian People's Action Counsel  
Center for Digital Democracy  
Edgemont Neighborhood Coalition  
Migrant Legal Action Program

Written Presentation for FCC Public Meeting

Panel 1: Contribution Assessment Methodologies

June 21, 2002

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## **A Connection-Based USF Fee Violates Section 254(d) of the 1996 Act**

- **A Connection-Based Fee Eliminates Contribution Requirements for Many Interexchange Carriers**
  - Section 254(d) specifically states that "[e]very telecommunications carrier" providing interstate services shall contribute to the fund.
  - The connection-based proposal, however, would allow a number of interexchange carriers to completely avoid any contribution responsibility, in clear violation of Section 254(d).
- **A Connection-Based Fee Is Not "Equitable and Nondiscriminatory"**
  - Section 254(d) also requires that any USF assessment be "equitable and nondiscriminatory."
  - A connection-based fee levies the same assessment on both "high-end" and "low-use" customers, and plainly discriminates against low-use and low-income customers.

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## **The CoSus Connection-Based Fee Proposal Will Hurt Low-Income and Low-Use Customers**

- The Flat \$1.00 USF Connection Fee Proposed By the Coalition for Sustainable Universal Service ("CoSus") Will Disproportionately Harm Low-Income and Low-Use Consumers
  - The CoSus proposal assumes that carriers would add at least a \$0.10 "administrative fee" in addition to the \$1.00 connection-based USF fee. Under this scenario, low-use customers would pay more in "USF recovery" under the connection-based proposal in all but 2 of the 18 calling plans studied. (*See Attachment 1*).
  - In addition, it is critical to note that the CoSus plan provides no cap for "excess" USF recovery or "administrative fees" that carriers could levy in addition to the proposed \$1.00 connection-based fee. Accordingly, if carriers levied a \$0.25 "administrative fee" in addition to the \$1.00 connection charge, low-use customers would pay more under the connection-based proposal than they currently do in all but 1 of the 18 calling plans studied. (*See Attachment 2*). Furthermore, if a \$0.51 "administrative fee" is charged, customers would pay more under the connection-based proposal than they do under any of the calling plans studied. (*See Attachment 3*).
- Even the CoSus statistics note that low-income consumers will pay more under their connection-based USF proposal than under the current revenue-based system. The CoSus data submitted in initial comments admits that 62% of all households with incomes below \$15,000 a year will pay more under the connection-based proposal, and that 58% of households making between \$15,000 and \$30,000 will pay more. (*See CoSus Comments, Attachment 2 at 6, Table 1*).

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## **Consumer Friendly USF Reform Proposals**

- The Basic Revenue-Based USF Assessment System Should Be Retained.
- Current USF "Safe Harbors," Such as the Wireless "Safe Harbor" Should Be Re-Examined in Light of Changing Market Conditions.
- The Commission Should Study Changes to the Current Assessment System That Would Eliminate the USF Assessment "Lag."
- The Commission Should Prohibit Customer "Pass-Through" of Carrier USF Assessments or, In the Alternative, Limit Carrier Recovery to the Actual Amount of the Applicable USF Assessment Factor to Protect Consumers From Abusive Carrier USF Recovery Practices.

# ATTACHMENT 1

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## CURRENT USF COSTS FOR LOW-USE AND AVERAGE-USE RESIDENTIAL LONG DISTANCE CUSTOMERS COMPARED WITH ANNUALIZED COST FOR LOW-USE AND AVERAGE-USE RESIDENTIAL CUSTOMERS ASSESSED A CONNECTIVITY FEE OF \$1.10

| Plan                                      | Advertised<br>Per-Minute<br>Rate | Monthly<br>Fee         | Current<br>USF %<br>& \$0.51<br>LEC | Proposed USF<br>Connectivity<br>Cost Per<br>Month | Total<br>End-User<br>Costs For<br>29 Minutes | Actual<br>Per-Minute<br>Rate For<br>29 Minutes | Current<br>USF<br>Costs For<br>29 Minutes | Current<br>USF<br>Costs For<br>58 Minutes | Total<br>End-User<br>Costs For<br>58 Minutes | Actual<br>Per-Minute<br>Rate For<br>58 Minutes | Annualized<br>USF Increase<br>for Low-Use<br>Customers | Annualized<br>USF Increase<br>For Ave.-Use<br>Customers |
|---|----------------------------------|------------------------|-------------------------------------|---|--|--|---|---|--|--|--|---|
| One Rate<br>Plus Plan                     | 0.07                             | \$3.95                 | 11.50%                              | \$ 1.10   | \$ 6.67                                      | \$ 0.23  | \$ 0.69                                   | \$ 0.92                                   | \$ 8.93                                      | \$ 0.15  | \$ (1.17)  | \$ (3.97)   |
| Anytime<br>Advantage<br>Savings<br>Option | 0.07                             | \$2.95                 | 9.90%                               | \$ 1.10   | \$ 5.47                                      | \$ 0.19  | \$ 0.49                                   | \$ 0.69                                   | \$ 7.70                                      | \$ 0.13  | \$ 1.16  | \$ (1.25)   |
| Anytime                                   | 0.07                             | \$5.95<br>to<br>\$0.00 | 9.90%                               | \$ 1.10   | \$ 8.77                                      | \$ 0.30  | \$ 0.79                                   | \$ 0.99                                   | \$ 11.00                                     | \$ 0.19  | \$ (2.40)  | \$ (4.81)   |
| Everdial1                                 | 0.049                            | \$0.00                 | 9.25%                               | \$ 1.10   | \$ 2.23                                      | \$ 0.08  | \$ 0.20                                   | \$ 0.40                                   | \$ 4.46                                      | \$ 0.08  | \$ 4.67  | \$ 2.26   |
| N/A                                       | 0.045                            | \$0.00                 | 8.50%                               | \$ 1.10   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 5.50  | \$ 3.93   |
| N/A                                       | 0.045                            | \$0.00                 | 8.50%                               | \$ 1.10   | \$ 1.42                                      | \$ 0.05  | \$ 0.11                                   | \$ 0.22                                   | \$ 2.83                                      | \$ 0.05  | \$ 5.75  | \$ 4.42   |
| N/A                                       | 0.049                            | \$0.00                 | 6.90%                               | \$ 1.10   | \$ 1.52                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 3.04                                      | \$ 0.05  | \$ 5.90  | \$ 4.73   |
| N/A                                       | 0.049                            | \$0.00                 | 9.25%                               | \$ 1.10   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 5.50  | \$ 3.93   |
| N/A                                       | 0.054                            | \$0.00                 | 9.90%                               | \$ 1.10   | \$ 1.72                                      | \$ 0.06  | \$ 0.16                                   | \$ 0.31                                   | \$ 3.44                                      | \$ 0.06  | \$ 5.22  | \$ 3.36   |
| N/A                                       | 0.039                            | \$2.00<br>to<br>\$0.00 | 9.80%                               | \$ 1.10   | \$ 3.44                                      | \$ 0.12  | \$ 0.31                                   | \$ 0.42                                   | \$ 4.68                                      | \$ 0.08  | \$ 3.40  | \$ 2.07   |
| N/A                                       | 0.039                            | \$2.00<br>to<br>\$0.00 | 9.80%                               | \$ 1.10   | \$ 1.24                                      | \$ 0.04  | \$ 0.11                                   | \$ 0.22                                   | \$ 2.48                                      | \$ 0.04  | \$ 5.75  | \$ 4.42   |
| N/A                                       | 0.049                            | \$2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.10   | \$ 3.66                                      | \$ 0.13  | \$ 0.24                                   | \$ 0.33                                   | \$ 5.18                                      | \$ 0.09  | \$ 4.25  | \$ 3.07   |
| N/A                                       | 0.049                            | \$2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.10   | \$ 1.52                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 3.04                                      | \$ 0.05  | \$ 5.90  | \$ 4.73   |
| N/A                                       | 0.045                            | \$2.00<br>to<br>\$0.00 | 7.70%                               | \$ 1.10   | \$ 3.56                                      | \$ 0.12  | \$ 0.25                                   | \$ 0.35                                   | \$ 4.96                                      | \$ 0.09  | \$ 4.03  | \$ 2.82   |
| N/A                                       | 0.045                            | \$2.00<br>to<br>\$0.00 | 7.70%                               | \$ 1.10   | \$ 1.41                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 2.81                                      | \$ 0.05  | \$ 5.87  | \$ 4.67   |
| N/A                                       | 0.049                            | \$2.50<br>to<br>\$0.00 | 9.90%                               | \$ 1.10   | \$ 4.31                                      | \$ 0.15  | \$ 0.39                                   | \$ 0.53                                   | \$ 5.87                                      | \$ 0.10  | \$ 2.42  | \$ 0.73   |
| N/A                                       | 0.049                            | \$2.50<br>to<br>\$0.00 | 9.90%                               | \$ 1.10   | \$ 1.56                                      | \$ 0.05  | \$ 0.14                                   | \$ 0.28                                   | \$ 3.12                                      | \$ 0.05  | \$ 5.39  | \$ 3.70   |
| N/A                                       | 0.069                            | \$0.00                 | 12%                                 | \$ 1.10   | \$ 2.24                                      | \$ 0.08  | \$ 0.24                                   | \$ 0.48                                   | \$ 4.48                                      | \$ 0.08  | \$ 4.20  | \$ 1.32   |

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## ATTACHMENT 2

**CURRENT USF COSTS FOR LOW-USE AND AVERAGE-USE RESIDENTIAL LONG DISTANCE CUSTOMERS  
COMPARED WITH ANNUALIZED COST FOR LOW-USE AND AVERAGE-USE RESIDENTIAL CUSTOMERS ASSESSED A CONNECTIVITY FEE OF \$1.25**

| Plan                                      | Advertised<br>Per-Minute<br>Rate | Monthly<br>Fee          | Current<br>USF %<br>& \$0.51<br>LEC | Proposed USF<br>Connectivity<br>Cost Per<br>Month | Total<br>End-User<br>Costs For<br>29 Minutes | Actual<br>Per-Minute<br>Rate For<br>29 Minutes | Current<br>USF<br>Costs For<br>29 Minutes | Current<br>USF<br>Costs For<br>58 Minutes | Total<br>End-User<br>Costs For<br>58 Minutes | Actual<br>Per-Minute<br>Rate For<br>58 Minutes | Annualized<br>USF Increase<br>for Low-Use<br>Customers | Annualized<br>USF Increase<br>For Ave.-Use<br>Customers |
|---|----------------------------------|-------------------------|-------------------------------------|---|--|--|---|---|--|--|--|---|
| One Rate<br>Plus Plan                     | 0.07                             | \$3.95                  | 11.50%                              | \$ 1.25   | \$ 6.67                                      | \$ 0.23  | \$ 0.69                                   | \$ 0.92                                   | \$ 8.93                                      | \$ 0.15  | \$ 0.63  | \$ (2.17)   |
| Anytime<br>Advantage<br>Savings<br>Option | 0.07                             | \$2.95                  | 9.90%                               | \$ 1.25   | \$ 5.47                                      | \$ 0.19  | \$ 0.49                                   | \$ 0.69                                   | \$ 7.70                                      | \$ 0.13  | \$ 2.96  | \$ 0.55   |
| Anytime                                   | 0.07                             | \$ 5.95<br>to<br>\$0.00 | 9.90%                               | \$ 1.25   | \$ 8.77<br>\$ 2.23                           | \$ 0.30<br>\$ 0.08                             | \$ 0.79<br>\$ 0.20                        | \$ 0.99<br>\$ 0.40                        | \$ 11.00<br>\$ 4.46                          | \$ 0.19<br>\$ 0.08                             | \$ (0.60)<br>\$ 6.47                                   | \$ (3.01)<br>\$ 4.06                                    |
| Everdial1                                 | 0.049                            | \$0.00                  | 9.25%                               | \$ 1.25   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 7.30  | \$ 5.73   |
| N/A                                       | 0.045                            | \$0.00                  | 8.50%                               | \$ 1.25   | \$ 1.42                                      | \$ 0.05  | \$ 0.11                                   | \$ 0.22                                   | \$ 2.83                                      | \$ 0.05  | \$ 7.55  | \$ 6.22   |
| N/A                                       | 0.049                            | \$0.00                  | 6.90%                               | \$ 1.25   | \$ 1.52                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 3.04                                      | \$ 0.05  | \$ 7.70  | \$ 6.53   |
| N/A                                       | 0.049                            | \$0.00                  | 9.25%                               | \$ 1.25   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 7.30  | \$ 5.73   |
| N/A                                       | 0.054                            | \$0.00                  | 9.90%                               | \$ 1.25   | \$ 1.72                                      | \$ 0.06  | \$ 0.16                                   | \$ 0.31                                   | \$ 3.44                                      | \$ 0.06  | \$ 7.02  | \$ 5.16   |
| N/A                                       | 0.039                            | \$ 2.00<br>to<br>\$0.00 | 9.80%                               | \$ 1.25   | \$ 3.44<br>\$ 1.24                           | \$ 0.12<br>\$ 0.04                             | \$ 0.31<br>\$ 0.11                        | \$ 0.42<br>\$ 0.22                        | \$ 4.68<br>\$ 2.48                           | \$ 0.08<br>\$ 0.04                             | \$ 5.20<br>\$ 7.55                                     | \$ 3.87<br>\$ 6.22                                      |
| N/A                                       | 0.049                            | \$ 2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.25   | \$ 3.66<br>\$ 1.52                           | \$ 0.13<br>\$ 0.05                             | \$ 0.24<br>\$ 0.10                        | \$ 0.33<br>\$ 0.20                        | \$ 5.18<br>\$ 3.04                           | \$ 0.09<br>\$ 0.05                             | \$ 6.05<br>\$ 7.70                                     | \$ 4.87<br>\$ 6.53                                      |
| N/A                                       | 0.045                            | \$ 2.00<br>to<br>\$0.00 | 7.70%                               | \$ 1.25   | \$ 3.56<br>\$ 1.41                           | \$ 0.12<br>\$ 0.05                             | \$ 0.25<br>\$ 0.10                        | \$ 0.35<br>\$ 0.20                        | \$ 4.96<br>\$ 2.81                           | \$ 0.09<br>\$ 0.05                             | \$ 5.83<br>\$ 7.67                                     | \$ 4.62<br>\$ 6.47                                      |
| N/A                                       | 0.049                            | \$ 2.50<br>to<br>\$0.00 | 9.90%                               | \$ 1.25   | \$ 4.31                                      | \$ 0.15  | \$ 0.39                                   | \$ 0.53                                   | \$ 5.87                                      | \$ 0.10  | \$ 4.22  | \$ 2.53   |
| N/A                                       |                                  | \$0.00                  |                                     |   | \$ 1.56                                      | \$ 0.05  | \$ 0.14                                   | \$ 0.28                                   | \$ 3.12                                      | \$ 0.05  | \$ 7.19  | \$ 5.50   |
| N/A                                       | 0.069                            | \$0.00                  | 12%                                 | \$ 1.25   | \$ 2.24                                      | \$ 0.08  | \$ 0.24                                   | \$ 0.48                                   | \$ 4.48                                      | \$ 0.08  | \$ 6.00  | \$ 3.12   |

### ATTACHMENT 3

#### CURRENT USF COSTS FOR LOW-USE AND AVERAGE-USE RESIDENTIAL LONG DISTANCE CUSTOMERS COMPARED WITH ANNUALIZED COST FOR LOW-USE AND AVERAGE-USE RESIDENTIAL CUSTOMERS ASSESSED A CONNECTIVITY FEE OF \$1.51

| Plan                                      | Advertised<br>Per-Minute<br>Rate | Monthly<br>Fee          | Current<br>USF %<br>& \$0.51<br>LEC | Proposed USF<br>Connectivity<br>Cost Per<br>Month | Total<br>End-User<br>Costs For<br>29 Minutes | Actual<br>Per-Minute<br>Rate For<br>29 Minutes | Current<br>USF<br>Costs For<br>29 Minutes | Current<br>USF<br>Costs For<br>58 Minutes | Total<br>End-User<br>Costs For<br>58 Minutes | Actual<br>Per-Minute<br>Rate For<br>58 Minutes | Annualized<br>USF Increase<br>for Low-Use<br>Customers | Annualized<br>USF Increase<br>For Ave.-Use<br>Customers |
|---|----------------------------------|-------------------------|-------------------------------------|---|--|--|---|---|--|--|--|---|
| One Rate<br>Plus Plan                     | 0.07                             | \$3.95                  | 11.50%                              | \$ 1.51   | \$ 6.67                                      | \$ 0.23  | \$ 0.69                                   | \$ 0.92                                   | \$ 8.93                                      | \$ 0.15  | \$ 3.75  | \$ 0.95   |
| Anytime<br>Advantage<br>Savings<br>Option | 0.07                             | \$2.95                  | 9.90%                               | \$ 1.51   | \$ 5.47                                      | \$ 0.19  | \$ 0.49                                   | \$ 0.69                                   | \$ 7.70                                      | \$ 0.13  | \$ 6.08  | \$ 3.67   |
| Anytime                                   | 0.07                             | \$ 5.95<br>to<br>\$0.00 | 9.90%                               | \$ 1.51   | \$ 8.77                                      | \$ 0.30  | \$ 0.79                                   | \$ 0.99                                   | \$ 11.00                                     | \$ 0.19  | \$ 2.52  | \$ 0.11   |
| Everdial1                                 | 0.049                            | \$0.00                  | 9.25%                               | \$ 1.51   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 10.42   | \$ 8.85   |
| N/A                                       | 0.045                            | \$0.00                  | 8.50%                               | \$ 1.51   | \$ 1.42                                      | \$ 0.05  | \$ 0.11                                   | \$ 0.22                                   | \$ 2.83                                      | \$ 0.05  | \$ 10.67   | \$ 9.34   |
| N/A                                       | 0.049                            | \$0.00                  | 6.90%                               | \$ 1.51   | \$ 1.52                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 3.04                                      | \$ 0.05  | \$ 10.82   | \$ 9.65   |
| N/A                                       | 0.049                            | \$0.00                  | 9.25%                               | \$ 1.51   | \$ 1.55                                      | \$ 0.05  | \$ 0.13                                   | \$ 0.26                                   | \$ 3.10                                      | \$ 0.05  | \$ 10.42   | \$ 8.85   |
| N/A                                       | 0.054                            | \$0.00                  | 9.90%                               | \$ 1.51   | \$ 1.72                                      | \$ 0.06  | \$ 0.16                                   | \$ 0.31                                   | \$ 3.44                                      | \$ 0.06  | \$ 10.14   | \$ 8.28   |
| N/A                                       | 0.039                            | \$ 2.00<br>to<br>\$0.00 | 9.80%                               | \$ 1.51   | \$ 3.44                                      | \$ 0.12  | \$ 0.31                                   | \$ 0.42                                   | \$ 4.68                                      | \$ 0.08  | \$ 8.32  | \$ 6.99   |
| N/A                                       | 0.049                            | \$ 2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.51   | \$ 1.24                                      | \$ 0.04  | \$ 0.11                                   | \$ 0.22                                   | \$ 2.48                                      | \$ 0.04  | \$ 10.67   | \$ 9.34   |
| N/A                                       | 0.049                            | \$ 2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.51   | \$ 3.66                                      | \$ 0.13  | \$ 0.24                                   | \$ 0.33                                   | \$ 5.18                                      | \$ 0.09  | \$ 9.17  | \$ 7.99   |
| N/A                                       | 0.049                            | \$ 2.00<br>to<br>\$0.00 | 6.90%                               | \$ 1.51   | \$ 1.52                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 3.04                                      | \$ 0.05  | \$ 10.82   | \$ 9.65   |
| N/A                                       | 0.045                            | \$ 2.00<br>to<br>\$0.00 | 7.70%                               | \$ 1.51   | \$ 3.56                                      | \$ 0.12  | \$ 0.25                                   | \$ 0.35                                   | \$ 4.96                                      | \$ 0.09  | \$ 8.95  | \$ 7.74   |
| N/A                                       | 0.045                            | \$ 2.00<br>to<br>\$0.00 | 7.70%                               | \$ 1.51   | \$ 1.41                                      | \$ 0.05  | \$ 0.10                                   | \$ 0.20                                   | \$ 2.81                                      | \$ 0.05  | \$ 10.79   | \$ 9.59   |
| N/A                                       | 0.049                            | \$ 2.50<br>to<br>\$0.00 | 9.90%                               | \$ 1.51   | \$ 4.31                                      | \$ 0.15  | \$ 0.39                                   | \$ 0.53                                   | \$ 5.87                                      | \$ 0.10  | \$ 7.34  | \$ 5.65   |
| N/A                                       | 0.049                            | \$0.00                  | 9.90%                               | \$ 1.51   | \$ 1.56                                      | \$ 0.05  | \$ 0.14                                   | \$ 0.28                                   | \$ 3.12                                      | \$ 0.05  | \$ 10.31   | \$ 8.62   |
| N/A                                       | 0.069                            | \$0.00                  | 12%                                 | \$ 1.51   | \$ 2.24                                      | \$ 0.08  | \$ 0.24                                   | \$ 0.48                                   | \$ 4.48                                      | \$ 0.08  | \$ 9.12  | \$ 6.24   |